

DG/SR  
F.#2016R01231

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

STELLA BOYADJIAN, et al.,

Defendants.

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STIPULATION AND ORDER

18 CR 57 (MKB)

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys and ORDERED by the Court, pursuant to Federal Rule of Criminal Procedure 16(d), that:

1. Any and all discovery material produced to the defendants STELLA BOYADJIAN and HRACHYA ATOYAN (the "defendants") by the government in the above-captioned case (the "discovery material"), and any and all copies, notes, transcripts, documents or other information derived or prepared from the discovery material, may be used by the defendants and defense counsel for any purpose consistent with this order in furtherance of the representation of the defendants in connection with the above-captioned indictment;
2. Any and all discovery material produced to the defendants by the government and any copies, notes, transcripts, documents or other information derived or prepared from the discovery material shall not be further disseminated by the defendants or defense counsel to any individuals, organizations or other entities, other than members of the

legal staff of defense counsel or retained consultants or expert witnesses who have signed this Stipulation and Order, without further order of the Court;

3. Each of the individuals to whom disclosure is authorized in paragraph 2, that is, members of the legal staff of defense counsel who have signed this Stipulation and Order, shall be provided a copy of this Stipulation and Order and will be advised that he or she shall not further disseminate any portion of the discovery material or any copies, notes, transcripts, documents or other information derived or prepared from the discovery material except in conformity with this Stipulation and Order;

4. Where the defendants and/or defense counsel wish to disclose any portion of the discovery material or any copies, notes, transcripts, documents or other information derived or prepared from the discovery material to any individual to whom disclosure is not authorized by paragraph 2, defense counsel must provide advance notice to the government, and such notice must be given sufficiently in advance of the contemplated disclosure so as to permit the government to raise an objection with the Court regarding the propriety of such disclosure;

5. Nothing in this Stipulation and Order shall preclude the government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery material;

6. If the defendants obtain substitute counsel, the undersigned defense counsel will not transfer any portion of the discovery material or any copies, notes,

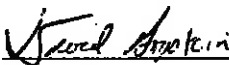
transcripts, documents or other information derived or prepared from the discovery material unless and until substitute counsel enters into this Stipulation and Order;

7. Any discovery materials provided pursuant to this Order shall be returned to the United States Attorney's Office, including all copies, within ten days of the completion of the case before the Court or, if an appeal is taken, within ten days of the completion of the case in the United States Court of Appeals for the Second Circuit or Supreme Court of the United States; and

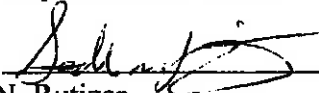
8. Any violation of this Stipulation and Order (a) will require the immediate return to the United States of the discovery material and all copies thereof, and (b) may result in contempt of Court.

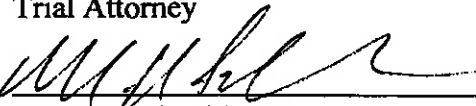
Dated: Brooklyn, New York  
~~February~~ March, 2018

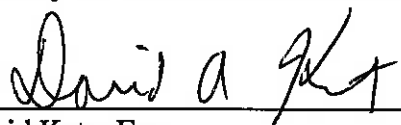
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By:   
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By:   
Sasha N. Rutizer  
Trial Attorney

  
Michael Schneider, Esq.  
Attorney for STELLA BOYADJIAN

  
David Katz, Esq.  
Attorney for HRACHYA ATOYAN

SO ORDERED.

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THE HONORABLE MARGO K. BRODIE  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK